

**Summary of the  
Accrediting Authority Committee Teleconference  
November 26, 1996**

The National Environmental Laboratory Accreditation Conference (NELAC) Accrediting Authority Committee met by teleconference from 11:30 a.m. to 1:00 p.m. Eastern Standard Time (EST) Tuesday, November 26, 1996. The meeting was led by Committee Chair, Mr. John Anderson of the State of Illinois Environmental Protection Agency (IL-EPA). A list of action items is given in Attachment A. A list of Committee members/invited guests is given in Attachment B. A copy of the teleconference agenda is given in Attachment C.

## **INTRODUCTION**

*The purpose of the teleconference was to continue to discuss the updated version of Chapter 6.*  
The following items were discussed:

- Action Items Identified in the Minutes of the November 20, 1996, Teleconference -- Minutes had been prepared and reviewed by Mr. Anderson but had not been approved by Ms. Jeanne Mourrain, NELAC Director, so they were not distributed to the Committee at this time.
- Review of Updated Version of Chapter 6 -- The Committee systematically reviewed section by section the current draft of Chapter 6.

Mr. Jack Farrell noted that the Data Integrity Workshop, "Managing Liabilities, Building Reputations," will be held February 2-3, 1996, at the San Francisco Airport Marriott Hotel. The workshop is scheduled at the same time as the NELAC Interim Meeting (February 3-5, 1996) in Bethesda, MD. Because the workshop is sponsored by organizations that are also heavily involved in NELAC, a number of NELAC committee members may have a scheduling conflict. Mr. Farrell suggested scheduling the Accrediting Authority Committee meeting no earlier than February 4, 1996, to accommodate members who will be attending both the Data Integrity Workshop and the NELAC Interim Meeting. Mr. Anderson suggested the Accrediting Authority Committee may have to have a special evening session to help accommodate this scheduling conflict.

## **REVIEW OF ACTION ITEMS IN MINUTES OF NOVEMBER 14, 1996, TELECONFERENCE**

- |         |            |   |
|---------|------------|---|
| Item 1. | Completed. | Mr. Anderson revised Section 6.2(e)(3) to state that an accrediting authority may not impose financial restrictions on a participating laboratory other than the collection of fees. The Committee agreed that this revised language met the ISO Guide 58, 7.2 requirement.   |
| Item 2. | Completed. | The time period for notice of the renewal date for NELAP recognition of an accrediting authority was extended from 90 days to 180 calendar days.  |
| Item 3. | Completed. | All references in Chapter 6 for response-time limits were changed to specify "calendar days" rather than "working days."  |
| Item 4. | Completed. | Mr. Anderson rewrote Section 6.3.2(a) to indicate that the National Environmental Laboratory Accreditation Program (NELAP) is required to provide notices of changes in the NELAP application, application process or other required notices only to accrediting authorities that have submitted an initial application or are NELAP-recognized.  |
| Item 5. | Completed. | Section 6.3.2 (c)(1) was added to Chapter 6 to address the inclusion of an index in the NELAP application. [The requirement for the index has also been addressed in Section 6.3.1 (b)(21)]. The objective of the index is to serve as a checklist for the United States Environmental Protection Agency (USEPA) to determine the completeness of an accrediting authority's application and to expedite review by the NELAP assessment team. |
| Item 6. | Completed. | Mr. Anderson and Ms. Jeri Long have rewritten Section 6.3.3(d)(9)(D) to address the Committee's concerns for advertising a laboratory's NELAP accreditation status.   |

## **SYSTEMATIC REVIEW OF CHAPTER 6**

### **Section 6.2 -- General Provisions (e)(3)**

The Committee approved the terminology that limited financial conditions or restrictions specifically to the collection of fees.

**(h)(1)(G)**

Section (G) was added according to the Flowers/Robinson list of requirements in ISO Guide 58. The Committee approved the addition of the entire section.

**Section 6.3 -- Application for NELAP Recognition**

**6.3.1 -- Written Application for NELAP Recognition**

**(a)**

This section was rewritten to include a specific contact point for requesting NELAP information and applications for NELAP recognition; “Office of the NELAP Director, United States Environmental Protection Agency.” The Committee approved the change.

**(b)(4)**

The Committee agreed to change “Workmen’s” to “Workman’s” to be consistent with terminology used in Section 6.3.1(b)(4).

**(b)(21)**

The Committee approved a requirement to include an index (checklist) in the application. The NELAP assessment team will review each application for inclusion of items listed on the checklist. By utilizing the checklist as an index for information contained in the application, the committee felt review of the application package could be completed much more expeditiously.

**(c)**

The Committee approved changing “chief executive officer” to “highest ranking individual within the department or agency responsible for laboratory accreditation activities for which NELAP recognition is being sought.”

**(d)(1)**

The Committee approved the change in the notification requirement from 90 days to 180 calendar days for NELAP to notify an accrediting authority of the expiration of its NELAP recognition.

**(e)**

The Committee approved deleting the time frame requirements for notification to NELAP of changes in an accrediting authority’s environmental laboratory accreditation program, consistent with ISO Guide 58 terminology. The accrediting authority is responsible of notifying NELAP at the time changes are made in its environmental laboratory accreditation program.

**(e)(2)**

The Committee agreed that “both” should be changed to “either” in order to require notifying NELAP of any and all changes in organizational structure.

**(e)(5)**

The committee approved the addition of Section (e)(5) to require that NELAP be notified of changes in the contractual agreements or the organizational structure of organizations contracted by an accrediting authority.

**6.3.3 -- Application Technical Review by a NELAP Assessment Team**

**(a)(4)**

The Committee agreed that NELAP should endeavor to appoint the same assessment team for the entirety of the four-year NELAP-recognition cycle that includes the technical assessment (paper review), on-site assessment, and application renewal process. At the beginning of a new four-year cycle, a different assessment team should be selected. (A change in one member of the assessment team is interpreted to constitute a different team.)

**(d)(1)**

The change from “public” to “governmental” was approved.

**(d)(4)**

The Committee agreed to delete the term “financial” in the first sentence of the section. The second sentence was changed to: “The time period applies so long as all turn-around times for the responses to proficiency testing, application review and on-site assessment issues are carried out within the required time limits set forth in NELAC standards.”

**(d)(5)(A) through (G)**

Section (d)(5) was changed to specify criteria for recordkeeping consistent with requirements of ISO Guide 58 noted in the Flowers/Robinson list. The Committee approved the additions.

**(d)(7)**

The Committee approved the replacement of “chief executive officer” with the “individual responsible for day-to-day management.”

**(d)(9)**

Because the appropriateness of NELAP status in report forms was addressed in Chapter 5, all references to report forms were deleted in this section. The section was rewritten on the basis of ISO Guide 58, and borrowed heavily from requirements established by the American Association for Laboratory Accreditation (A2LA).

**(9)(A) through (D)**

The Committee approved these sections as written.

**(10)(A) and (B)**

The Committee approved these sections as written.

**(10)(C)**

The Committee discussed at length the pertinence of including Section (d)(10)(C) relative to a laboratory's responsibility to inform its client about procedures to verify the laboratory's NELAP accreditation. The Committee acknowledged that Section 6.3.3 (d)(10)(C) addressed laboratory ethics, an issue that could not be legislated. However, the section was considered to offer strength by giving leverage for enforcement issues to an accrediting authority. For example, a laboratory that reports compliance data for a particular field of testing must be accredited for this field of testing or its entire accreditation can be revoked by the accrediting authority.

Mr. Anderson thought that the section should be maintained, and the Committee generally agreed but decided to review the section at the next teleconference. Of course, a laboratory can report data for fields of testing for which it is not certified so long as it does not claim certification for those fields of testing.

**(11)**

The Committee considered that this section should only address punitive issues and changed it to read: "has arrangements to ensure that the NELAP-accredited laboratories upon suspension, revocation, or withdrawal of the NELAP accreditation shall:"

**(11)(A)**

The Committee agreed that this section addressed previous accreditation issues and changed the wording to read: "discontinue use of all catalogs, advertising, business solicitation, proposals, quotation, or other materials that contain reference to their past NELAP accreditation status."

**(12)**

The Committee approved this section, but noted that there was no guidance for on-site assessors to carry out this review. The Committee concurred that the accrediting authority must have a mechanism to address fraudulence in a laboratory's advertisement of its accreditation status.

**(13)**

Section (13) addressed internal audits of an accrediting authority. ISO Guide 58 requires that an internal audit be carried out at least once per year. However, the internal auditing process differs from State to State. In Illinois, an internal audit is performed on selected parameters (such as management, operations, quality assurance [QA] activities) in the laboratory program on an annual basis. Parameters are changed from year to year. In Kansas, an internal audit is performed only upon the direction of the governor and primarily addresses fiscal issues. The Committee agreed that the assessment team should verify that an accrediting authority has an internal audit system that is consistent with ISO Guide 58 requirements. Mr. Farrell will rewrite this section and it will be incorporated into the new draft (Revision 4) of Chapter 6.

**(14)**

The Committee agreed that the term "chief executive officer" should be consistent with terminology used in Section 6.3.3(d)(7), "individual responsible for day-to-day management."

**(15)**

The Committee accepted the inclusion of Section (15), incorporated as a result of an ISO Guide

58 requirement identified in the Flowers/Robinson list.

**(17)**

The Committee discussed time requirements for record retention relative to reciprocity issues. Business records are required to be maintained for 10 years. This section will be rewritten as follows: “has a policy and procedures for retaining records for a minimum of 10 years or longer as prescribed by specific programs.”

**(18)**

Section (18) was accepted on the basis of the Freedom of Information Act.

**(19)(C)**

This section was drafted on the basis of the Flowers/Robinson list of ISO Guide 58 requirements to address the question of fraudulence in subcontracting or consulting. Mr. Anderson and Ms. Long will review and clarify this section according to ISO Guide 58 requirements.

## **CONCLUSION**

Mr. Anderson concluded the teleconference by indicating that the Committee had worked through approximately half of Chapter 6. He anticipated that the subsequent review would move faster because, hopefully, most of the controversial issues in Chapter 6 had been discussed. The Committee was asked to be prepared to continue the section-by-section review of Chapter 6 at the next meeting.

## **NEXT TELECONFERENCE**

The next teleconference is scheduled for Wednesday, December 4, 1996, from 1:00 to 3:00 p.m. EST.

**ACTION ITEMS**  
**Accrediting Authority Committee Teleconference**  
**November 26, 1996**

<b>Item No.</b>	<b>Action</b>	<b>Date Completed</b>
1	Mr. Farrell will rewrite Section 6.3.3(d)(13) to be incorporated into the next revision of Chapter 6.	November 26, 1996
2	Mr. Anderson will rewrite Section 6.3.3(d)(17) to reflect that an accrediting authority's records be maintained for a minimum of 10 years or longer as prescribed by specific programs.	November 26, 1996
3	Mr. Anderson and Ms. Jeri Long will review Section 6.3.3(d)(19)(C) to clarify fraudulence and conflict-of-interest issues relating to subcontractors or consultants.	November 26, 1996

**LIST OF COMMITTEE MEMBERS/TELECONFERENCE PARTICIPANTS**  
**Accrediting Authority Committee Teleconference**  
**November 26, 1996**

<b>Name</b>	<b>Affiliation</b>	<b>Phone/Fax/E-mail</b>
John Anderson, Chair	Illinois EPA, Division of Laboratories	Tel: 217-782-6455 Fax: 217-524-0944 E-mail: epa6103@epa.state.il.us
Maude Bullock (Absent)	Department of the Navy	Tel: 703-602-1738 Fax: 703-602-5547 E-mail: bullockm@n4.opnav.navy.mil
Jack Farrell	Analytical Excellence, Inc.	Tel: 407-331-5040 Fax: 407-331-4025 E-mail: AEX@ix.netcom.com
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Jim Meyer (Absent)	NC EHNH/DEN Chemistry Lab	Tel: 919-733-3906 Fax: 919-733-6241 E-mail:
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Bob Wyeth (Absent)	RECRA Environmental, Inc.	Tel: 716-691-2600 Fax: 716-691-2617 E-mail: labnet@recra.com
Jeri Long	Illinois EPA, Division of Laboratories (Assistant to the Chair)	Tel: 217-782-6455 Fax: 217-524-0944 E-mail: epa6110@epa.state.il.us
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**AGENDA**  
**Accrediting Authority Committee Teleconference**  
**November 26, 1996**

Tuesday, November 26, 1996

11:30 a.m. - 1:00 p.m. Eastern Standard Time

(Note: only 1 ½ hours in length)

Review minutes of 11/20/96

Committee Meeting and Status of

Assignments from that meeting

(Minutes not yet distributed).

Discuss and hopefully approve wording changes authorized during our 11/20/96 meeting. These wording changes are shown as strike-outs and underlines on pages 1-18 of Chapter 6, Revision 3.

Continue systematic review of Chapter 6, Section by Section, starting at 6.3.3(d)(9) on page 18 of the double-spaced Revision 3 of Chapter 6 dated 11/21/96.

12:45 p.m. - Eastern Time

- Assess progress made at today's meeting.
- How to proceed from here.
- Assignments for interim between now and next meeting.

1:00 p.m. - Automatic Shutoff.